

**IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY,
PENNSYLVANIA**

HEIDI A. CHARLES, individually and
as an Administrator of the Estate of
[REDACTED], deceased,
and [REDACTED], a minor, by
and through HEIDI A. CHARLES, as a
parent and natural guardian of a minor,

Plaintiffs,

vs.

WHEELING & LAKE ERIE
RAILWAY COMPANY, a Delaware
corporation,

Defendant.

CIVIL DIVISION

NO. GD-22- 7056

TYPE OF PLEADING:

**PRAECIPE FOR WRIT OF
SUMMONS IN CIVIL ACTION**

FILED ON BHEALF OF:

**PLAINTIFFS, HEIDI A. CHARLES,
individually and as an Administrator of
the Estate of [REDACTED],
deceased, and [REDACTED], a
minor, by and through HEIDI A.
CHARLES, as a parent and natural
guardian of a minor**

**COUNSEL OF RECORD FOR THIS
PARTY:**

MARK F. McKENNA, ESQUIRE
PA I.D. No. 30297

McKENNA & ASSOCIATES, P.C.

436 Boulevard of the Allies
Suite 500
Pittsburgh, PA 15219
Phone (412) 471-6226
Fax (412) 471-6658

mfm@mckennaandassociates.com

JURY TRIAL DEMANDED

FILED
2022 JUN 10 PM 3:49
DEPT OF COURT RECORDS
CIVIL DIVISION
ALLEGHENY COUNTY

OPS\$KRISTOPHER1
10 June 2022
15:55:19
GD-22-007056

IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY,
PENNSYLVANIA

HEIDI A. CHARLES, individually and
as an Administrator of the Estate of
[REDACTED], deceased,
and [REDACTED], a minor, by
and through HEIDI A. CHARLES, as a
parent and natural guardian of a minor,

CIVIL DIVISION

NO. GD-22- 7056

Plaintiffs,

vs.

WHEELING & LAKE ERIE
RAILWAY COMPANY, a Delaware
corporation,

Defendant.

PRAECIPE FOR WRIT OF SUMMONS

TO: DEPARTMENT OF COURT RECORDS, ALLEGHENY COUNTY

Kindly issue a Writ of Summons in Civil Action against the Defendant,
WHEELING & LAKE ERIE RAILWAY COMPANY, in the above-captioned matter.

McKENNA & ASSOCIATES, P.C.

BY:

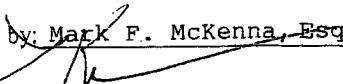


MARK F. MCKENNA, ESQUIRE
*Attorneys for Plaintiffs, HEIDI A. CHARLES,
individually and as an Administrator of the
Estate of [REDACTED], deceased,
and [REDACTED], a minor, by and
through HEIDI A. CHARLES, as a parent and
natural guardian of a minor*

CERTIFICATE OF COMPLIANCE

I certify that this filing complies with the provisions of the *Public Access Policy of the Unified Judicial System of Pennsylvania: Case Records of the Appellate and Trial Courts* that require filing confidential information and documents differently than non-confidential information and documents.

Submitted by: Mark F. McKenna, Esquire

Signature: 

Name: Mark F. McKenna

Attorney No. (if applicable): 30297

Supreme Court of Pennsylvania



**Court of Common Pleas
Civil Cover Sheet
ALLEGHENY**

County

For Prothonotary Use Only:	TIME STAMP
Docket No:	GD-22-7054

The information collected on this form is used solely for court administration purposes. This form does not supplement or replace the filing and service of pleadings or other papers as required by law or rules of court.

S E C T I O N A	Commencement of Action:				
	<input type="checkbox"/> Complaint	<input checked="" type="checkbox"/> Writ of Summons	<input type="checkbox"/> Petition		
	<input type="checkbox"/> Transfer from Another Jurisdiction		<input type="checkbox"/> Declaration of Taking		
	Lead Plaintiff's Name: Heidy A. Charles, individually and as Administrator		Lead Defendant's Name: Wheeling & Lake Erie Railway Company		
	Are money damages requested? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		Dollar Amount Requested: (check one) <input type="checkbox"/> within arbitration limits <input checked="" type="checkbox"/> outside arbitration limits		
Is this a <i>Class Action Suit</i> ? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		Is this an <i>MDJ Appeal</i> ? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
Name of Plaintiff/Appellant's Attorney: Mark F. McKenna, Esquire					
<input type="checkbox"/> Check here if you have no attorney (are a Self-Represented [Pro Se] Litigant)					

<p>Nature of the Case: Place an "X" to the left of the ONE case category that most accurately describes your PRIMARY CASE. If you are making more than one type of claim, check the one that you consider most important.</p>		
<p>TORT (do not include Mass Tort)</p> <p><input type="checkbox"/> Intentional <input type="checkbox"/> Malicious Prosecution <input type="checkbox"/> Motor Vehicle <input type="checkbox"/> Nuisance <input checked="" type="checkbox"/> Premises Liability <input type="checkbox"/> Product Liability (does not include mass tort) <input type="checkbox"/> Slander/Libel/ Defamation <input type="checkbox"/> Other:</p> <hr/> <hr/>	<p>CONTRACT (do not include Judgments)</p> <p><input type="checkbox"/> Buyer Plaintiff <input type="checkbox"/> Debt Collection: Credit Card <input type="checkbox"/> Debt Collection: Other</p> <hr/> <hr/> <p><input type="checkbox"/> Employment Dispute: Discrimination <input type="checkbox"/> Employment Dispute: Other</p> <hr/> <hr/> <p><input type="checkbox"/> Other:</p> <hr/> <hr/>	<p>CIVIL APPEALS</p> <p>Administrative Agencies</p> <p><input type="checkbox"/> Board of Assessment <input type="checkbox"/> Board of Elections <input type="checkbox"/> Dept. of Transportation <input type="checkbox"/> Statutory Appeal: Other</p> <hr/> <hr/> <p><input type="checkbox"/> Zoning Board <input type="checkbox"/> Other:</p> <hr/> <hr/>
<p>MASS TORT</p> <p><input type="checkbox"/> Asbestos <input type="checkbox"/> Tobacco <input type="checkbox"/> Toxic Tort - DES <input type="checkbox"/> Toxic Tort - Implant <input type="checkbox"/> Toxic Waste <input type="checkbox"/> Other:</p> <hr/> <hr/>	<p>REAL PROPERTY</p> <p><input type="checkbox"/> Ejectment <input type="checkbox"/> Eminent Domain/Condemnation <input type="checkbox"/> Ground Rent <input type="checkbox"/> Landlord/Tenant Dispute <input type="checkbox"/> Mortgage Foreclosure: Residential <input type="checkbox"/> Mortgage Foreclosure: Commercial <input type="checkbox"/> Partition <input type="checkbox"/> Quiet Title <input type="checkbox"/> Other:</p> <hr/> <hr/>	<p>MISCELLANEOUS</p> <p><input type="checkbox"/> Common Law/Statutory Arbitration <input type="checkbox"/> Declaratory Judgment <input type="checkbox"/> Mandamus <input type="checkbox"/> Non-Domestic Relations <input type="checkbox"/> Restraining Order <input type="checkbox"/> Quo Warranto <input type="checkbox"/> Replevin <input type="checkbox"/> Other:</p> <hr/> <hr/>
<p>PROFESSIONAL LIABILITY</p> <p><input type="checkbox"/> Dental <input type="checkbox"/> Legal <input type="checkbox"/> Medical <input type="checkbox"/> Other Professional:</p> <hr/> <hr/>		

Updated 1/1/2011

**IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY,
PENNSYLVANIA**

HEIDI A. CHARLES, individually and
as an Administrator of the Estate of
[REDACTED], deceased,
and [REDACTED], a minor, by
and through HEIDI A. CHARLES, as a
parent and natural guardian of a minor,

Plaintiffs,

vs.

WHEELING & LAKE ERIE
RAILWAY COMPANY, a Delaware
corporation,

Defendant.

CIVIL DIVISION

NO. GD-22-007056

**TYPE OF PLEADING:
AFFIDAVIT OF SERVICE**

FILED ON BEHALF OF:

**PLAINTIFFS, HEIDI A. CHARLES,
individually and as an Administrator of
the Estate of [REDACTED],
deceased, and [REDACTED], a
minor, by and through HEIDI A.
CHARLES, as a parent and natural
guardian of a minor**

**COUNSEL OF RECORD FOR THIS
PARTY:**

MARK F. MCKENNA, ESQUIRE
PA I.D. No. 30297

MCKENNA & ASSOCIATES, P.C.

436 Boulevard of the Allies
Suite 500
Pittsburgh, PA 15219
Phone (412) 471-6226
Fax (412) 471-6658

mfm@mckennaandassociates.com

JURY TRIAL DEMANDED

**IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY,
PENNSYLVANIA**

HEIDI A. CHARLES, individually and
as an Administrator of the Estate of
[REDACTED], deceased,
and [REDACTED], a minor, by
and through HEIDI A. CHARLES, as a
parent and natural guardian of a minor,

CIVIL DIVISION

NO. GD-22-007056

Plaintiffs,

vs.

WHEELING & LAKE ERIE
RAILWAY COMPANY, a Delaware
corporation,

Defendant.

AFFIDAVIT OF SERVICE

The undersigned hereby states under the penalties provided by 18 Pa. C.S.A. §4904 (relating to unsworn falsifications to authorities) that on June 13, 2022, the undersigned caused a true and correct copy of the Praecept for Writ of Summons (the "Writ") in connection with the above referenced matter, to be mailed by certified mail, return receipt requested, to the following:

Wheeling & Lake Erie Railway Company
100 First Street SE
Brewster, OH 44613

Attached hereto as Exhibit "A" is the receipt showing delivery and acceptance on June 16, 2022.

McKENNA & ASSOCIATES, P.C.

BY:

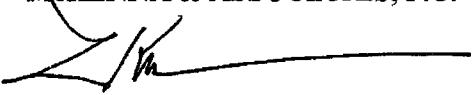
MARK F. MCKENNA, ESQUIRE
*Attorneys for Plaintiffs, HEIDI A. CHARLES,
individually and as an Administrator of the
Estate of [REDACTED], deceased,
and [REDACTED] a minor, by and
through HEIDI A. CHARLES, as a parent and
natural guardian of a minor*

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing Affidavit of Service was forward via U.S. mail, postage prepaid, to the following this 26th day of June 2022:

Wheeling & Lake Erie Railway Company
100 First Street SE
Brewster, OH 44613

McKENNA & ASSOCIATES, P.C.

BY: 

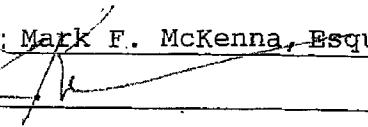
MARK F. McKENNA, ESQUIRE
Attorneys for Plaintiffs, HEIDI A. CHARLES, individually and as an Administrator of the Estate of [REDACTED] deceased, and [REDACTED] a minor, by and through HEIDI A. CHARLES, as a parent and natural guardian of a minor

EXHIBIT A

CERTIFICATE OF COMPLIANCE

I certify that this filing complies with the provisions of the *Public Access Policy of the Unified Judicial System of Pennsylvania: Case Records of the Appellate and Trial Courts* that require filing confidential information and documents differently than non-confidential information and documents.

Submitted by: Mark F. McKenna, Esquire

Signature: 

Name: Mark F. McKenna

Attorney No. (if applicable): 30297

**CONFIDENTIAL
INFORMATION
FORM**



Case Records Public Access Policy of the Unified Judicial System of Pennsylvania
204 Pa. Code § 213.81
www.pacourts.us/public-records

Heidi A. Charles, individually and as an
Administrator of the estate of [REDACTED]
deceased, and [REDACTED] GD 22-007056
(Party name as displayed in case caption) minor, by and Docket/Case No.

through Heidi A. Charles,
Vs. as a parent and natural
guardian of a minor

Wheeling & Lake Erie Railway Allegheny County Ct. Com. Dl.
(Party name as displayed in case caption) Company Court

This form is associated with the pleading titled Principle to Enter Appearance, dated 6/28/22.

Pursuant to the *Case Records Public Access Policy of the Unified Judicial System of Pennsylvania*, the Confidential Information Form shall accompany a filing where confidential information is required by law, ordered by the court, or otherwise necessary to effect the disposition of a matter. This form, and any additional pages, shall remain confidential, except that it shall be available to the parties, counsel of record, the court, and the custodian. This form, and any additional pages, must be served on all unrepresented parties and counsel of record.

This Information Pertains to:	Confidential Information:	References in Filing:
(full name of adult)	Social Security Number (SSN):	Alternative Reference: SSN 1
OR This information pertains to a minor with the initials of <u>J.M.</u> and the full name of [REDACTED]	Financial Account Number (FAN):	Alternative Reference: FAN 1
(full name of minor) and date of birth: <u>Unknown</u> <u>at this time</u>	Driver License Number (DLN):	Alternative Reference: DLN 1
	State of Issuance:	Alternative Reference: SID 1
(full name of adult) OR This information pertains to a minor with the initials of <u>A.G.</u> and the full name of [REDACTED]	State Identification Number (SID):	Alternative Reference: SSN 2
(full name of minor) and date of birth: <u>Unknown</u> <u>at this time</u>	Social Security Number (SSN):	Alternative Reference: FAN 2
	Financial Account Number (FAN):	Alternative Reference: DLN 2
	Driver License Number (DLN):	Alternative Reference: SID 2
	State of Issuance:	
	State Identification Number (SID):	

**CONFIDENTIAL
INFORMATION
FORM**



Additional page(s) attached. 0 total pages are attached to this filing.

I certify that this filing complies with the provisions of the *Case Records Public Access Policy of the Unified Judicial System of Pennsylvania* that require filing confidential information and documents differently than non-confidential information and documents.

Scott D. Clements

Signature of Attorney or Unrepresented Party

6/22/22

Date

Name: SCOTT D. CLEMENTS

Attorney Number: (if applicable) 78529

Address: TWO PPG PLACE, SUITE 400
Pittsburgh, PA 15222

Telephone: (412) 281-7272

Email: sclements@dmclaw.com

NOTE: Parties and attorney of record in a case will have access to this Confidential Information Form. Confidentiality of this information must be maintained.

IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY, PENNSYLVANIA

HEIDI A. CHARLES, individually and as an Administrator of the Estate of J.G., deceased, and A.G., a minor, by and through HEIDI A. CHARLES, as a parent and natural guardian of a minor,

Plaintiffs,

v.

WHEELING & LAKE ERIE RAILWAY COMPANY,

Defendant.

CIVIL DIVISION

No. GD 22-007056

Issue No.

PRAECIPE TO ENTER APPEARANCE

Code:

Filed on behalf of Defendant,
WHEELING & LAKE ERIE RAILWAY COMPANY

Counsel of record for this party:

J. Lawson Johnston, Esquire
PA I.D. #19792

Scott D. Clements, Esquire
PA I.D. #78529

DICKIE, McCAMEY & CHILCOTE, P.C.
Firm #067
Two PPG Place, Suite 400
Pittsburgh, PA 15222-5402

(412) 281-7272

JURY TRIAL DEMANDED

IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY, PENNSYLVANIA

HEIDI A. CHARLES, individually and
as an Administrator of the Estate of J.G.,
deceased, and A.G. , a minor, by and
through HEIDI A. CHARLES, as a parent
and natural guardian of a minor,

CIVIL DIVISION

No. GD 22-007056

Plaintiffs,

v.

WHEELING & LAKE ERIE RAILWAY
COMPANY,

Defendant.

PRAECLPICE TO ENTER APPEARANCE

To: Department of Court Records

Kindly enter the appearance of J. Lawson Johnston and Scott D. Clements, as counsel
for Wheeling & Lake Erie Railway Company, Defendant in the above-captioned matter.

Respectfully submitted,

DICKIE, McCAMEY & CHILCOTE, P.C.

By: /s/Scott D. Clements
J. Lawson Johnston, Esquire
Scott D. Clements, Esquire

Two PPG Place, Suite 400
Pittsburgh, PA 15222-5402
(412) 281-7272

Counsel for Defendant,
Wheeling & Lake Erie Railway Company

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing **Praecipe to Enter Appearance** has been served by first-class U.S. Mail and electronic mail this 22nd day of June, 2022, to the following counsel of record:

Mark F. McKenna, Esquire
McKenna & Associates, P.C.
436 Boulevard of the Allies
Suite 500
Pittsburgh, PA 15219

DICKIE, McCAMEY & CHILCOTE, P.C.

By: /s/Scott D. Clements
Scott D. Clements, Esquire

Counsel for Defendant,
Wheeling & Lake Erie Railway Company

14619322.1

CONFIDENTIAL
INFORMATION
FORM

Case Records Public Access Policy of the Unified Judicial System of Pennsylvania

204 Pa. Code § 213.81

Heidi A. Charles, individually and
as an Administrator of the Estate ofwww.pacourts.us/public-records

[REDACTED], deceased, and
[REDACTED], a minor, by and through
Heidi A. Charles, as a parent and natural
(Party name as displayed in case caption)
guardian of a minor

6D 22-007056

Docket/Case No.

Vs.

Wheeling & Lake Erie Railway Company

Allegheny County

(Party name as displayed in case caption)

Court

Petition for Rule to

File Complaint, dated June 23, 2022

Pursuant to the *Case Records Public Access Policy of the Unified Judicial System of Pennsylvania*, the Confidential Information Form shall accompany a filing where confidential information is **required by law, ordered by the court, or otherwise necessary to effect the disposition of a matter**. This form, and any additional pages, shall remain confidential, except that it shall be available to the parties, counsel of record, the court, and the custodian. This form, and any additional pages, must be served on all unrepresented parties and counsel of record.

This Information Pertains to:	Confidential Information:	References in Filing:
(full name of adult)	Social Security Number (SSN):	Alternative Reference: SSN 1
OR	Financial Account Number (FAN):	Alternative Reference: FAN 1
This information pertains to a minor with the initials of <u>J.G.</u> and the full name of [REDACTED]	Driver License Number (DLN):	Alternative Reference: DLN 1
(full name of minor)	State of Issuance:	Alternative Reference: SID 1
and date of birth: <u>Unknown at this time</u>	State Identification Number (SID):	Alternative Reference: SID 1
(full name of adult)	Social Security Number (SSN):	Alternative Reference: SSN 2
OR	Financial Account Number (FAN):	Alternative Reference: FAN 2
This information pertains to a minor with the initials of <u>A.C.</u> and the full name of [REDACTED]	Driver License Number (DLN):	Alternative Reference: DLN 2
(full name of minor)	State of Issuance:	Alternative Reference: SID 2
and date of birth: <u>Unknown at this time</u>	State Identification Number (SID):	

2022 JUN 23 AM 11:08
DEPT OF COURT RECORDS
CIVIL/FAMILY DIVISION
ALLEGHENY COUNTY, PA

**CONFIDENTIAL
INFORMATION
FORM**



Additional page(s) attached. 0 total pages are attached to this filing.

I certify that this filing complies with the provisions of the *Case Records Public Access Policy of the Unified Judicial System of Pennsylvania* that require filing confidential information and documents differently than non-confidential information and documents.

Scott D. Clements

Signature of Attorney or Unrepresented Party

6/23/2022

Date

Name: Scott D. Clements

Attorney Number: (if applicable) 78529

Address: Two PPG Place, Suite 400
Pittsburgh, PA 15222

Telephone: (412) 281-7272

Email: Sclements@dmclaw.com

NOTE: Parties and attorney of record in a case will have access to this Confidential Information Form. Confidentiality of this information must be maintained.

IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY, PENNSYLVANIA

HEIDI A. CHARLES, individually and
as an Administrator of the Estate of J.G.,
deceased, and A.G., a minor, by and
through HEIDI A. CHARLES, as a parent
and natural guardian of a minor,

Plaintiffs,

v.

WHEELING & LAKE ERIE RAILWAY
COMPANY,

Defendant.

CIVIL DIVISION

No. GD 22-007056

Issue No.

**PRAECLPICE FOR RULE TO FILE
COMPLAINT**

Code:

Filed on behalf of Defendant,
**WHEELING & LAKE ERIE RAILWAY
COMPANY**

Counsel of record for this party:

J. Lawson Johnston, Esquire
PA I.D. #19792

Scott D. Clements, Esquire
PA I.D. #78529

DICKIE, McCAMEY & CHILCOTE, P.C.
Firm #067
Two PPG Place, Suite 400
Pittsburgh, PA 15222-5402

(412) 281-7272

JURY TRIAL DEMANDED

FILED
2022 JUN 23 AM 11:09

DEPT OF COURT RECORDS
CIVIL/FAMILY DIVISION
ALLEGHENY COUNTY PA

IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY, PENNSYLVANIA

HEIDI A. CHARLES, individually and
as an Administrator of the Estate of J.G.,
deceased, and A.G., a minor, by and
through HEIDI A. CHARLES, as a parent
and natural guardian of a minor,

CIVIL DIVISION

No. GD 22-007056

Plaintiffs,

v.

WHEELING & LAKE ERIE RAILWAY
COMPANY,

Defendant.

PRAECIPE FOR RULE TO FILE COMPLAINT

To: Department of Court Records

Please enter a Rule against the Plaintiffs to file a Complaint against the Defendant
within twenty (20) days hereof or suffer the entry of a Judgment of Non Pros.

Respectfully submitted,

DICKIE, McCAMEY & CHILCOTE, P.C.

Date: June 23, 2022

By: Scott D. Clements
J. Lawson Johnston, Esquire
Scott D. Clements, Esquire

Two PPG Place, Suite 400
Pittsburgh, PA 15222-5402
(412) 281-7272

Counsel for Defendant,
Wheeling & Lake Erie Railway Company

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing **Praecipe for Rule to File Complaint** has been served by first-class U.S. Mail and electronic mail this 23rd day of June, 2022, to the following counsel of record:

Mark F. McKenna, Esquire
McKenna & Associates, P.C.
436 Boulevard of the Allies
Suite 500
Pittsburgh, PA 15219

DICKIE, McCAMEY & CHILCOTE, P.C.

By: Scott D. Clements
Scott D. Clements, Esquire

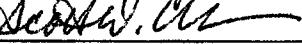
Counsel for Defendant,
Wheeling & Lake Erie Railway Company

14619322.1

CERTIFICATE OF COMPLIANCE

"I certify that this filing complies with the provisions of the *Case Records Public Access Policy of the Unified Judicial System of Pennsylvania* that require filing confidential information and documents differently than non-confidential information and documents."

Submitted by: Scott D. Clements

Signature: 

Name: Scott D. Clements

Attorney No. (if applicable): 78529

14619322.1

**CONFIDENTIAL
INFORMATION
FORM**


*Case Records Public Access Policy of the Unified Judicial System of Pennsylvania
204 Pa. Code § 213.81*

HEIDI A. CHARLES, individually and as an www.pacourts.us/public-records
Administrator of the Estate of J. G., deceased
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HEIDI A. CHARLES, as a parent and natural
guardian of a minor,
(Party name as displayed in case caption)

GD 22-007056

Docket/Case No.

Vs.

WHEELING & LAKE ERIE RAILWAY COMPANY

Allegheny County

(Party name as displayed in case caption)

Court

This form is associated with the pleading titled Affidavit of Service of Rule to File Complaint, dated July 11, 2022.

Pursuant to the *Case Records Public Access Policy of the Unified Judicial System of Pennsylvania*, the Confidential Information Form shall accompany a filing where confidential information is **required by law, ordered by the court, or otherwise necessary to effect the disposition of a matter**. This form, and any additional pages, shall remain confidential, except that it shall be available to the parties, counsel of record, the court, and the custodian. This form, and any additional pages, must be served on all unrepresented parties and counsel of record.

This Information Pertains to:	Confidential Information:	References in Filing:
(full name of adult) OR This information pertains to a minor with the initials of <u>J. G.</u> and the full name of <u>██████████</u> (full name of minor) and date of birth: <u>unknown at this time.</u>	Social Security Number (SSN): Financial Account Number (FAN): Driver License Number (DLN): State of Issuance: State Identification Number (SID): <u>██████████</u>	Alternative Reference: SSN 1 Alternative Reference: FAN 1 Alternative Reference: DLN 1 Alternative Reference: SID 1
(full name of adult) OR This information pertains to a minor with the initials of <u>A. G.</u> and the full name of <u>██████████</u> (full name of minor) and date of birth: <u>unknown at this time.</u>	Social Security Number (SSN): Financial Account Number (FAN): Driver License Number (DLN): State of Issuance: State Identification Number (SID): <u>██████████</u>	Alternative Reference: SSN 2 Alternative Reference: FAN 2 Alternative Reference: DLN 2
(full name of adult) OR This information pertains to a minor with the initials of <u>A. G.</u> and the full name of <u>██████████</u> (full name of minor) and date of birth: <u>unknown at this time.</u>	Social Security Number (SSN): Financial Account Number (FAN): Driver License Number (DLN): State of Issuance: State Identification Number (SID): <u>██████████</u>	Alternative Reference: SSN 2 Alternative Reference: FAN 2 Alternative Reference: DLN 2 Alternative Reference: SID 2

**CONFIDENTIAL
INFORMATION
FORM**



Additional page(s) attached. 0 total pages are attached to this filing.

I certify that this filing complies with the provisions of the *Case Records Public Access Policy of the Unified Judicial System of Pennsylvania* that require filing confidential information and documents differently than non-confidential information and documents.

Scott D. Clements
Signature of Attorney or Unrepresented Party

7-11-2022
Date

Name: Scott D. Clements

Attorney Number: (if applicable) 78529

Address: Two PPG Place, Suite 400

Telephone: (412) 281-7272

Pittsburgh, PA 15222

Email: scléments@dmclaw.com

NOTE: Parties and attorney of record in a case will have access to this Confidential Information Form. Confidentiality of this information must be maintained.

IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY, PENNSYLVANIA

HEIDI A. CHARLES, individually and
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deceased, and A. G., a minor, by and
through HEIDI A. CHARLES, as a parent
and natural guardian of a minor,

Plaintiffs,

v.

WHEELING & LAKE ERIE RAILWAY
COMPANY,

Defendant.

CIVIL DIVISION

No. GD 22-007056

Issue No.

**AFFIDAVIT OF SERVICE OF RULE TO
FILE COMPLAINT**

Code:

Filed on behalf of Defendant,
**WHEELING & LAKE ERIE RAILWAY
COMPANY**

Counsel of record for this party:

J. Lawson Johnston, Esquire
PA I.D. #19792

Scott D. Clements, Esquire
PA I.D. #78529

DICKIE, McCAMEY & CHILCOTE, P.C.
Firm #067
Two PPG Place, Suite 400
Pittsburgh, PA 15222-5402

(412) 281-7272

JURY TRIAL DEMANDED

IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY, PENNSYLVANIA

HEIDI A. CHARLES, individually and
as an Administrator of the Estate of J. G.,
deceased, and A. G., a minor, by and
through HEIDI A. CHARLES, as a parent
and natural guardian of a minor,

CIVIL DIVISION

No. GD 22-007056

Plaintiffs,

v.

WHEELING & LAKE ERIE RAILWAY
COMPANY,

Defendant.

AFFIDAVIT OF SERVICE OF RULE TO FILE COMPLAINT

I, Scott D. Clements, Esquire, do hereby provide this Affidavit of Service pursuant to Pa.R.C.P. 76 and Pa.R.C.P. 405 in support of the following facts:

1. I am counsel of record for Defendant, Wheeling & Lake Erie Railway Company, in this action.
2. On July 1, 2022, I sent a letter to counsel for Plaintiffs, Mark F. McKenna, by certified mail, return receipt requested, serving the Rule to File Complaint issued by the Department of Court Records. (True and correct copies of the July 1, 2022 letter and Rule to File Complaint are attached hereto collectively as Exhibit "A").
3. On or about July 7, 2022, I received back from the United States Postal Service the signed green, return receipt card evidencing that the certified mail was delivered to Mr. McKenna's office on July 5, 2022 based on U.S. Postal Service Tracking. (The original signed green, return receipt card and USPS tracking confirmation are attached hereto collectively as Exhibit "B").

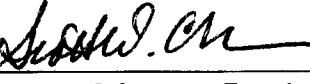
4. This Affidavit is being supplied as confirmation of service of the Rule to File Complaint served on counsel for Plaintiffs on July 1, 2022.

5. I understand that false statements herein are made subject to the penalties of 18 Pa.C.S. § 4904 relating to unsworn falsification to authorities

Respectfully submitted,

DICKIE, McCAMEY & CHILCOTE, P.C.

Dated: 7-11-2022

By: 

J. Lawson Johnston, Esquire
Scott D. Clements, Esquire

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Counsel for Defendant,
Wheeling & Lake Erie Railway Company